

BC

FILED

3/29/2024

KG

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTIN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

-vs-

Mary Madison	)
Plaintiff,	)
	)
	)
	)
	)
Steve Schroeder	)
Creative Werks, LLC	)
Defendant	)

Case Number: 1:23-CV-16476

Honorable Judge Manish S. Shah

**PLAINTIFF'S RULE 55 MOTION FOR DEFAULT JUDGMENT AND ORDER OF JUDGMENT**

**NOW COMES** the Plaintiff and in support of her Motion for Default Judgment pursuant to Federal Rule of Civil Procedure 55, states as follows:

1. Plaintiff initiated these proceedings on December 4, 2023 seeking relief for Title VII and 42 USC §§ 1981 and 1985 violations.
2. The Jurisdiction and Venue are proper.
3. Defendant Creative Werks was served, pursuant Fed. R. Civ. P. 4, with a copy of the Complaint and Summons on December 15, 2023 to its registered agent as set forth on the attached Certificate of Service. (Exhibit A)
4. Defendant's answer was due and owing since January 5, 2024, pursuant to Fed. R. Civ. P. 12(a). {Dkt. #8}
5. More than twenty (20) days have elapsed since Defendants were served and Defendants have failed to file an appearance, answer, plead, or otherwise defend the allegations of Plaintiff's Complaint.

6. Defendant Steve Schroeder submitted to the Jurisdiction of the Court and was to respond or otherwise plead in accordance with Fed. R. Civ. P. 12(a).
7. The Court order Defendants to answer, plead or otherwise defend in accordance with Fed. R. Civ. P. 12(a) by February 14, 2024. (Dkt. Entry # 20)
8. More than twenty (20) days have elapsed since Defendant Steve Schroeder submitted to the Jurisdiction of the court and the Court Order for Defendant to file an answer, plead, or otherwise defend the allegations of Plaintiff's Complaint.
9. Defendants' failure to answer, defend and deny the allegations of Plaintiff's complaint results in those allegations being admitted and Plaintiff therefore moves the Court for the entry of Default Judgment.

6. Plaintiff seeks an order finding the Defendants to be in default and setting a hearing to prove-up damages incurred because of Defendants' unlawful actions as alleged in the complaint and an order of judgment.

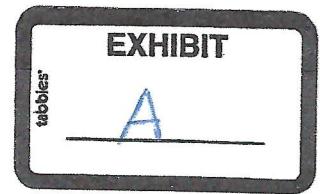
**WHEREFORE**, the Plaintiff respectfully requests that this Honorable Court enter an Order of Default Judgment, and an Order of Judgment and provide any other relief available.

Respectfully submitted,

/s/ \_\_\_\_\_  
Mary Madison  
9758 S Charles  
Chicago, IL 60643  
7732979569  
[Mdj123197@aol.com](mailto:Mdj123197@aol.com)

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT  
for the  
Northern District of Illinois

MARY *D* MADISON

Plaintiff(s)

CREATIVE WERKS, LLC.,  
STEVE SCHROEDER.

Defendant(s)

1:23-cv-16476  
Judge Elaine E. Bucklo  
Civil Action No. Magistrate Judge Beth W. Jantz  
RANDOM  
Cat. 2

## SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Creative Werks, LLC.  
c/o CT Corporation System, Registered Agent  
208 So. Lasalle Street  
Suite 814  
Chicago, IL

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Mary *D* Madison  
9758 S. Charles St.  
Chicago, IL 60643

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: 12/4/23*L. McGarr*

Signature of Clerk or Deputy Clerk

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for (name of individual and title, if any)  
was received by me on (date)

12/15/2023

Creative Works, LLC

I personally served the summons on the individual at (place)

on (date)

; or

I left the summons at the individual's residence or usual place of abode with (name)

, a person of suitable age and discretion who resides there.

on (date) \_\_\_\_\_, and mailed a copy to the individual's last known address; or

I served the summons on (name of individual) CT Corp. System, Deziel Agent, Deziel K, who is designated by law to accept service of process on behalf of (name of organization) Creative Works.

on (date)

12/15/2023; or

I returned the summons unexecuted because \_\_\_\_\_

; or

Other (specify): \_\_\_\_\_

My fees are \$ \_\_\_\_\_

I declare under per

Date:

12/15/2023

0.00



Server's signature



Printed name and title

2711 E. New York St. #205

Server's address

Aurora, IL 60502

Additional information regarding attempted service, etc:

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THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT